# TESTIMONY OF GARY FRAZER, ASSISTANT DIRECTOR FOR ECOLOGICAL SERVICES, U.S. FISH AND WILDLIFE SERVICE, DEPARTMENT OF THE INTERIOR,

### BEFORE THE HOUSE NATURAL RESOURCES COMMITTEE, SUBCOMMITTEE ON FISHERIES, WILDLIFE, OCEANS AND INSULAR AFFAIRS

REGARDING NINE BILLS TO REVISE THE BOUNDARIES OF CERTAIN UNITS OF THE JOHN H. CHAFEE COASTAL BARRIER RESOURCES SYSTEM: H.R. 187, H.R. 277, H.R. 1810, H.R. 1811H.R. 2057, H.R. 3226, H.R. 3227, H.R. 3572, AND H.R. 4222.

#### **April 8, 2014**

Good morning Chairman Fleming and Members of the Subcommittee. I am Gary Frazer, Assistant Director for Ecological Services with the U.S. Fish and Wildlife Service (Service). I appreciate the opportunity to testify today on nine bills related to the John H. Chafee Coastal Barrier Resources System (CBRS). My testimony provides the Administration's views on each of the bills and includes information on the Coastal Barrier Resources Act (CBRA), the Service's associated responsibilities, and program budget information. The attachment provides detail on each of the Coastal Barrier Resources System units affected by the bills.

#### **Background**

The CBRA established the CBRS, a defined set of geographic units along the Atlantic, Gulf of Mexico, Great Lakes, Puerto Rico, and U.S. Virgin Islands coasts. The 857 units of the CBRS are comprised of 3.1 million acres of coastal barrier habitat, including beaches, uplands, maritime forests, lagoons, mudflats, and coastal wetlands.

With the passage of the CBRA, Congress recognized that certain actions and programs of the Federal Government have historically subsidized and encouraged development on coastal barriers, resulting in the loss of natural resources, threats to human life, health, and property, and the expenditure of millions of tax dollars each year. The CBRA seeks to save taxpayers' money, keep people out of harm's way, and remove federal incentives to develop coastal barriers by restricting most new federal expenditures and financial assistance for areas designated within the CBRS. The CBRA does not prohibit or regulate development; however, it wisely removes the Federal incentives to build on these unstable and environmentally sensitive areas. Every Administration since that of President Reagan (who signed the CBRA into law in 1982) has strongly supported the CBRA and the common sense approach that risky private development on coastal barriers should not receive financial support from the American taxpayers.

Coastal barriers and their associated wetlands serve as important habitat for fish and wildlife and protect mainland communities from the full impact of hurricane winds and storm surges. Maintaining these natural storm buffers will be even more important as the Nation prepares for the more severe coastal flooding, erosion, and other anticipated effects associated with climate change and sea level rise. The United Nations Intergovernmental Panel on Climate Change (IPCC) projects that sea levels will likely rise between 10 and 32 inches by 2100 (IPCC Fifth

Assessment Report, September 2013). For South Atlantic coastal planning (southeast Virginia to the tip of Florida), projections of sea level rise being used by Landscape Conservation Cooperatives range from approximately 1.2 ft. to 6.6 feet by 2100, and similar projections are used for the Gulf Coast.

Coastal barriers also serve as popular vacation and recreation destinations, though developing and redeveloping these unstable areas is costly. The Federal Government spends millions of dollars each year on insurance payouts for homes located in high-risk coastal floodplains, pumping sand back onto eroding beaches, and armoring the shoreline to protect coastal development from the naturally occurring processes of erosion and accretion that continually change the coastal barrier profile. Such expenditures are further exacerbated following major storms. Flood insurance claims paid by the National Flood Insurance Program (NFIP) following Hurricanes Katrina, Wilma, and Rita in 2005 totaled \$17.7 billion (Lipton et. al 2012). Following Hurricane Sandy in 2012, Congress passed legislation to increase the NFIP's borrowing authority by \$9.7 billion, from \$20.7 billion to \$30.4 billion, to address claims from Hurricane Sandy and appropriated approximately \$50 billion to Federal agencies for response and recovery efforts (Government Accountability Office High-Risk Series: An Update, February 2013).

Development and redevelopment of coastal barriers is not only costly to the American taxpayers, but also puts people, homes, and infrastructure at risk, interferes with the natural movement of barrier islands, increases natural erosion processes, and disturbs important habitat for nesting sea turtles, migratory birds, and other fish and wildlife resources.

#### **CBRS Map Modernization**

The CBRA is a map-based law; most of the official CBRS maps were created more than two decades ago and are outdated technologically and in some cases difficult to interpret. Some maps contain errors that can have an adverse financial effect on property owners and project proponents.

Congress recognized the challenges associated with the existing maps and, in the 2000 reauthorization of the CBRA (Section 6 of P.L. 106-514), directed the Service to remap 50-75 CBRS areas using digital technology; and in the 2006 reauthorization of the CBRA (Section 4 of P.L. 109-226), directed the Service to prepare digital maps for the remainder of the CBRS. The Service agrees that the maps should be modernized. The Government Accountability Office and the Federal Interagency Floodplain Management Task Force have also recommended updating and modernizing the maps. To date, the Service has created comprehensively revised draft maps for approximately 12 percent of the CBRS (including those maps produced as part of the Digital Mapping Pilot Project).

*Digital Mapping Pilot Project* – The Service submitted its Digital Mapping Pilot Project report and accompanying draft maps for 70 units (approximately 10 percent of the total acreage within the CBRS) to Congress in 2008. In 2009 we conducted a public review of the draft maps. We are currently making adjustments to the pilot project maps, as appropriate, based on updated aerial imagery, information received through public comments, CBRA criteria, and objective

mapping protocols. The Service's final recommended maps will be included in a report to Congress, per the directives of the 2006 CBRA reauthorization (Section 3 of P.L. 109-226). The report will also contain the Service's official responses to the public comments received during the comment period and will describe any changes made to the draft maps transmitted to Congress in 2008. The Service anticipates the final recommended maps for the remaining pilot project units and the accompanying report to Congress will be completed in FY 2015.

Digital Conversion Project – Recognizing the need for updated and reliable CBRS data and maps, and the reality of resource constraints, the Service and the Federal Emergency Management Agency (FEMA) have established an interagency partnership to conduct a "digital conversion" of the CBRS maps which we anticipate will be completed for most of the CBRS by 2016. The purpose of the digital conversion project is to: (1) ensure that the CBRS boundaries depicted on FEMA's Flood Insurance Rate Maps (FIRMs) are consistent with the official CBRS maps; and (2) update the CBRS maps to account for natural changes (i.e., erosion and accretion) and to incorporate any voluntary additions and excess Federal property within the CBRS (as authorized under 16 U.S.C. 3503(c)-(e)). The CBRS digital conversion project is independent but complementary to the comprehensive map modernization effort and the two efforts are being pursued concurrently to accelerate the availability of more accurate and user-friendly CBRS data and maps for the public. The maps produced through the digital conversion effort are made effective administratively by the Service upon publication of a notice in the Federal Register and do not require enactment of legislation by Congress.

Hurricane Sandy Remapping Project – In October 2013, the Service was allocated \$5 million by the Department of the Interior through the Disaster Relief Appropriations Act of 2013 to support coastal resiliency and sustainability by comprehensively revising the CBRS maps for the eight states most affected by Hurricane Sandy: Connecticut, Delaware, Maryland, Massachusetts, New Jersey, New York, Rhode Island, and Virginia. This project will result in comprehensively revised maps for about 370 units covering about 16 percent of the total acreage within the CBRS. The Service will prepare draft revised maps that correct mapping errors affecting property owners and add undeveloped coastal barriers that are appropriate for inclusion within the CBRS. The Service plans to prepare comprehensively revised draft maps for the eight states by 2017. The maps will then be submitted to Congress for its consideration and will only become effective through legislation enacted by Congress.

Technical Correction Review Process and Comprehensive Map Modernization — The bills that are the subject of today's hearing address potential technical mapping errors that cannot be addressed administratively through the digital conversion project, but rather must undergo a more thorough review process which requires: (1) research by the Service into the intent of the original boundaries and the development status on the ground at the time the areas were originally included within the CBRS; (2) development of draft revised maps by the Service; (3) public review of the draft maps; (4) preparation of final recommended maps by the Service that take into consideration information provided during the public comment period; and (5) Congressional enactment of legislation to make the revised maps effective. This effort is referred to as "comprehensive map modernization."

When the Service is asked to determine whether a proposed change to remove land from the CBRS constitutes an appropriate technical correction, we consider whether the original intent of the boundaries is reflected on the maps (i.e. whether the lines on the maps appropriately follow the features they were intended to follow on the ground). We also consider the level of development that was on the ground when the area was originally included in the CBRS by Congress. The CBRA requires that we consider the following criteria when assessing the development status of a CBRS unit: (1) the density of development on an undeveloped coastal barrier is less than one structure per five acres of land above mean high tide; and (2) an undeveloped coastal barrier does not contain a full complement of infrastructure, which includes a road, fresh water supply, wastewater disposal system, and electric service to each lot or building site in the area. These criteria were originally published in a notice in the *Federal Register* by the Department of the Interior in 1982 and were later codified by Congress in the 2000 reauthorization of the CBRA (Section 2 of P.L. 106-514).

The Service has a significant backlog of requests to conduct technical correction reviews of more than 50 CBRS units (the earliest of which was received in 2002) and we have limited resources with which to conduct the reviews. The Administration does not support removing land from the CBRS unless there is compelling evidence that a mapping error was made. In cases where mapping errors are found, the Service supports changes to the maps and works with Congress and other interested parties to create comprehensively revised maps using modern digital technology.

When the Service finds a technical mapping error that warrants a change in one part of a CBRS map, we review all adjacent areas on the map to ensure that the entire map is accurate. The Service strongly believes that instead of pursuing targeted changes to CBRS maps, Congress should enact comprehensively revised CBRS maps. This comprehensive approach to map revisions, which was developed many years ago in coordination with the Subcommittee, treats all landowners who may be affected equitably. It is also more efficient and cost-effective in the long-run because it ensures that all legitimate errors are corrected and any new areas appropriate for inclusion within the CBRS are identified (per a directive in Section 4 in P.L. 109-226) at the same time so that the Service and Congress will not have to revisit the same map in the future. Two of the bills that are the subject of this hearing for units in South Carolina had targeted legislative fixes in the 1990's. Had the comprehensive approach been applied to those units in the past, the errors affecting property owners today could have been corrected more than 15 years ago.

One of the more time and resource intensive aspects of the technical correction review process is assessing claims that a full suite of infrastructure was present on the ground at the time a given area was included within the CBRS. As previously mentioned, the CBRA requires that we consider this when making recommendations on changes to CBRS maps. More than 30 years after the enactment of the CBRA, the Service is still receiving claims that an area should be removed from the CBRS based on the level of infrastructure that was present on the ground when the area was included within the CBRS. Such claims often require the compilation of historical records that can be difficult or impossible to obtain and validate many years later.

In light of climate change and sea level rise, and the length of time since the CBRA was enacted, the Service believes that the level of scrutiny should be high before removing areas from the CBRS and that the CBRA should be amended to sunset the infrastructure criterion. Specifically, the Service recommends that Congress revise Section 2 of P.L. 106-514 to sunset the infrastructure review criterion after 10 years of an area's inclusion within the CBRS. Such a change would mean that requests for reviews based on infrastructure claims would be considered if they are submitted to the Service within 10 years of the area being included within the CBRS. Such a change would help improve timeliness and reduce costs associated with reviewing claims of technical mapping errors, while continuing to be fair to private parties who had invested in infrastructure on the ground by allowing up to 10 years for an infrastructure claim to be submitted to the Service for consideration. The Service originally used the infrastructure criterion when conducting the inventory of undeveloped coastal barriers to ensure that property owners and developers that had already made significant on-the-ground investments and commitments to the development of coastal barriers were treated equitably. Today, after several decades have passed, the original investors for most developments are long gone and no longer require such protection. This recommendation to amend the infrastructure criterion of the CBRA was not applied to CBRS units being assessed as part of this hearing.

#### **Accomplishments and Priorities**

The Service balances the need to modernize the CBRS maps with many other competing needs and limited resources available to administer the CBRA. In FY 2013, the Service took significant steps to improve efficiencies and effectiveness of CBRA administration including: (1) the release of an online CBRS Mapper that makes approximate CBRS boundary data more accessible to property owners, project proponents, and other stakeholders who need to know whether properties or project sites may be affected by the CBRA; (2) processing a record number of official determinations as to whether individual properties are located "in" or "out" of the CBRS which is important for the issuance of flood insurance policies and real estate transactions; (3) releasing the first batch of digital conversion maps for stakeholder review and comment; and (4) prioritizing CBRA consistency consultation reviews for disaster assistance and infrastructure projects following Hurricane Sandy.

The Service allocated \$890,000 in FY 2014 for CBRA administration. In FY 2014, the Service plans to make digital conversion maps effective for approximately 40 percent of the total acreage within the CBRS, including all of the CBRS units in Delaware, Maine, Maryland, New Jersey, North Carolina, South Carolina, Virginia, and Texas. Additionally, in FY 2014, the Service plans to prepare comprehensively revised maps for Unit P16 in Florida and Units SC-01 and SC-03 in South Carolina, which are the subject of H.R. 1811, H.R. 3226 and H.R. 3227, respectively.

The President's FY 2015 Budget Request includes \$890,000 for CBRA administration. If the President's Request for CBRA is fully funded, the Service will have the capability to produce new comprehensively revised draft maps for approximately six CBRS areas. Additionally, in FY 2015 the Service plans to complete final recommended maps for the remaining 64 units in the pilot project; make digital conversion maps effective for Alabama, Florida (panhandle region), Michigan, Minnesota, Mississippi, New York (Great Lakes region), Ohio, and Wisconsin;

(comprising about 8 percent of the total acreage within the CBRS); and conduct research and mapping efforts associated with the Hurricane Sandy project.

#### **Legislation**

In general, the bills that are the subject of this hearing seek to enact certain revised CBRS maps. Those revised CBRS maps would remove land from CBRS units and make that land eligible for Federal subsidies that encourage development, including Federally-backed flood insurance.

The nine bills are summarized below and Service's position on the legislation is provided. More detailed information about each bill and the affected CBRS units can be found in Attachment 1.

### H.R.187: To correct the boundaries of the John H. Chafee Coastal Barrier Resources System Unit L06, Topsail, North Carolina

H.R. 187 addresses Topsail Unit L06 located in Onslow County, North Carolina. Unit L06 was designated with the enactment of the CBRA in 1982 and was expanded by the Coastal Barrier Improvement Act (CBIA) in 1990 to add associated aquatic habitat landward of the Intracoastal Waterway and add additional undeveloped uplands to the unit. H.R. 187 would replace the existing CBRS map for Unit L06 with a map dated "\_\_\_\_\_\_." While the intent of H.R. 187 is unclear as there is no replacement map yet referenced by the bill, the Service is aware that the Town of North Topsail Beach has long advocated for the removal of most of the land currently within Unit L06 from the CBRS so that Federal funding for beach renourishment, flood insurance, disaster assistance, and other Federal financial assistance would be available to the community. Unit L06 is one of the most developed units in the CBRS. Most of the development within the Town of North Topsail Beach has occurred since the area was added to the CBRS in 1982.

Unit L06 is one of 68 units under review as part of a Digital Mapping Pilot Project that was directed by the 2000 CBRA reauthorization (Section 6 of P.L. 106-514). While most of the pilot project maps are still being finalized, the Service has expedited the completion of its final recommended maps for Unit L06 (including the southern segment of Unit L05) as well as the maps for Units L07, L08, and L09, which are also the subject of legislation being considered at this hearing.

The Service does not have a position on H.R. 187 at this time because the legislation does not reference a specific map. However, the Service would support H.R. 187 if the legislation were amended to reference the Service's final recommended maps for Unit L06 and a portion of Unit L05 dated November 20, 2013 (attached).

## H.R. 277, to revise the boundaries of John H. Chafee Coastal Barrier Resources System Sachuest Point Unit RI-04P, Easton Beach Unit RI-05P, Almy Pond Unit RI-06, and Hazards Beach Unit RI-07 in Rhode Island

H.R. 277 would revise the boundaries of four units of the CBRS in Newport County, Rhode Island. These units are Sachuest Point Unit RI-04P, Easton Beach Unit RI-05P, Almy Pond Unit

RI-06, and Hazards Beach Unit RI-07. There have been no changes to the boundaries of these four units since their designation by the CBIA in 1990. The legislation replaces the existing map for these four units with a comprehensively revised and modernized map dated September 30, 2009. We have testified on similar bills in the 111<sup>th</sup> and 112<sup>th</sup> Congresses. The Service has updated the aerial imagery that serves as the base map and the new draft map is dated September 16, 2013. The CBRS boundaries depicted on the 2013 draft map are identical to those depicted on the 2009 draft map currently referenced in H.R. 277.

The Service supports H.R. 277 and recommends an amendment to the legislation to reference the Service's final recommended map for Units RI-04P, RI-05P, RI-06, and RI-07, which is dated September 16, 2013 (attached).

### H.R. 1810, to revise the boundaries of John H. Chafee Coastal Barrier Resources System Gasparilla Island Unit in Florida

H.R. 1810 would revise the boundaries of Gasparilla Island Unit FL-70P in Lee County, Florida and add a new System unit, Unit FL-70, to the CBRS. Unit FL-70P was established as an OPA by the CBIA in 1990. No changes have been made to the boundaries of the OPA since it was established. The draft revised map referenced in H.R. 1810 and dated May 23, 2012, is a map prepared by the Service in response to a request for legislative drafting assistance by the Chairman of the Subcommittee in 2012. The Service has prepared a final recommended map which is identical to the drafting assistance map for Units FL-70/FL-70P except that it would include within the CBRS a 10-acre parcel owned by the Florida Power and Light Company (FPL).

The Service supports H.R. 1810 and recommends an amendment to the legislation to reference the Service's final recommended map for Units FL-70/FL-70P, which is dated May 11, 2012 (attached).

### H.R. 1811, To remove from the John H. Chafee Coastal Barrier Resources System areas included in Florida System Unit P-16, and for other purposes

H.R. 1811 addresses Keewaydin Island Unit P16 located in Collier County, Florida. Unit P16 was established by the CBRA in 1982, expanded by the CBIA in 1990 to include wetlands as well as portions of Marco Island and Isles of Capri, and modified by the Service in 1997 to account for natural changes around Big Marco Pass. Section 1 of H.R. 1811 directs the Secretary of the Interior to prepare a revised map that would remove from Unit P16 the areas known as (1) Royal Marco Point on Marco Island and (2) La Peninsula of the Isles of Capri in Naples. Additionally, Section 2 of H.R. 1811 would modify Section 1316 of the National Flood Insurance Act of 1968 (42 U.S.C. 4023) to allow the availability of insurance under the NFIP for the properties that are in violation of state or local laws restricting land development or occupancy in flood-prone areas located that are removed from Unit P16 by Section 1 of the legislation. The Service believes that the intent of the legislation would be accomplished through a comprehensively revised map for this area.

The Service could support H.R. 1811 if the legislation were amended to reference a final recommended map that will be prepared by the Service in accordance with the comprehensive CBRS remapping protocols. The Service also recommends striking Section 2, which contains language that is not typically included within CBRA technical correction bills, from the legislation. The Service plans to conduct a comprehensive review and remapping of this area in FY 2014 and has allocated funds for this purpose. In accordance with the comprehensive mapping approach, we will review all adjacent areas on the maps to ensure that any other technical mapping errors are also addressed, and will identify any undeveloped coastal barrier areas that qualify for inclusion within the CBRS. We anticipate the draft revised maps will be ready for public review and comment by the end of FY 2014.

### H.R. 2057, To remove from the John H. Chafee Coastal Barrier Resources System the areas comprising Bay County Unit P-31P in Florida

H.R. 2057 addresses St. Andrew Complex P31P, located in Bay County, Florida. Unit P31P was established as an OPA by the CBIA in 1990 and was revised in 1994 to remove private lands from the OPA. The OPA generally includes St. Andrews State Park and about 134 acres of private land and associated aquatic habitat that is located to the north of Grand Lagoon. H.R. 2057 would remove the map that depicts Unit P31P from the set of official maps of the CBRS, thereby removing the entire area comprising Unit P31P from the CBRS. This legislation could also affect the adjacent Unit P31, which is partially shown on the same map panel as Unit P31P. The Service believes that this bill differs from typical CBRA technical correction bills in that it does not adopt a revised map to address technical mapping errors; rather it completely removes an entire OPA, encompassing approximately 1,923 acres, from the CBRS.

As H.R. 2057 does not address a technical mapping error, the Service does not believe that the entire area located within Unit P31P should be removed from the CBRS, and therefore opposes the bill.

### H.R. 3226, To remove from the John H. Chafee Coastal Barrier Resources System certain properties in South Carolina

H.R. 3226 addresses Long Pond Unit SC-01 located in Horry County, South Carolina. Unit SC-01 was established by the CBIA in 1990, was revised in 1993 to add private lands per the request of the property owner, and was revised again in 1996 to remove private lands from the unit. H.R. 3226 directs the Secretary of the Interior to revise the map of Unit SC-01 to remove two specific parcels from the CBRS. The two parcels in question are owned by the Myrtle Beach Travel Park and are located in the southwestern section of the unit. The portions of the two parcels currently within Unit SC-01 comprise about 11 upland acres.

The Service could support H.R. 3226 if it were amended to reference a comprehensively revised map to be prepared by the Service that addresses all technical mapping errors and adds any lands to the CBRS that meet the CBRA's criteria for an undeveloped coastal barrier. The Service plans to conduct a comprehensive assessment of Unit SC-01 and prepare a draft revised map of this area for public review by the end of FY 2014.

### H.R. 3227, To remove from the John H. Chafee Coastal Barrier Resources System certain properties in South Carolina

H.R. 3227 addresses Huntington Beach Unit SC-03 located in Georgetown County, South Carolina. Unit SC-03 was established by the CBIA in 1990 and was modified in 1998 to remove private land that was developed prior to the establishment of the unit. H.R. 3227 directs the Secretary of the Interior to revise the map of Unit SC-03 to remove 21 specific parcels from the CBRS. The portions of the 21 parcels currently within Unit SC-03 comprise about 12 acres of primarily upland areas. We note H.R. 3227 contains potential drafting errors – our review of the legislation and of Georgetown County property records found 18 of the parcel numbers identified in the legislation appear to have the first two digits incorrect, and one of the addresses listed does not correspond to the parcel number that is listed.

The Service could support H.R. 3227 if it were amended to reference a comprehensively revised map to be prepared by the Service that addresses all technical mapping errors and adds any lands to the CBRS that meet the CBRA's criteria for an undeveloped coastal barrier. The Service plans to conduct a comprehensive assessment of Unit SC-03 and prepare a draft revised map of this area for public review by the end of FY 2014.

### H.R. 3572, To revise the boundaries of certain John H. Chafee Coastal Barrier Resources System units in North Carolina

H.R. 3572 would revise the boundaries of three units of the CBRS in Onslow, Pender, and New Hanover Counties, North Carolina. These units are Lea Island Complex L07, Wrightsville Beach Unit L08, and Masonboro Island Unit L09. All three units were included within the CBRS by the CBRA in 1982 and expanded by the CBIA in 1990, mostly to include additional associated aquatic habitat. Unit L07 was modified by the Service in 1997 to account for natural changes on the south side of Rich Inlet. Unit L09 was modified by the Service in 1997 to account for natural changes on the north side of Masonboro Inlet. The legislation replaces the existing maps for these three units with maps dated "\_\_\_\_\_\_".

Units L07, L08, and L09 are among the 68 units under review as part of a Digital Mapping Pilot Project that was directed by the 2000 CBRA reauthorization (Section 6 of P.L. 106-514). These three units span three existing CBRS maps. Our review indicated that all three units warranted modifications to remove development that was on-the-ground before being added to the CBRS. The Service, therefore, would support H.R. 3572 if it were amended to reference the Service's final recommended maps for Units L07, L08, and L09, which are dated March 12, 2014 (attached).

## H.R. 4222, To correct the boundaries of John H. Chafee Coastal Barrier Resources System units in Florida, and for other purposes.

H.R. 4222 addresses Cape San Blas Unit P30, and Indian Peninsula Unit FL-92, located in Gulf County, Florida. Unit P30 was designated as a System unit by CBRA in 1982, and was expanded in 1990 to include open water and a few islands in St. Joseph Bay. Unit FL-92 was

designated as a System unit by the CBIA in 1990. Much of the area within Units P30 and FL-92 has been developed over the years despite CBRA's restrictions on Federal spending.

H.R. 4222 would replace the existing CBRS map for Unit P30 and FL-92 with a map dated "\_\_\_\_\_." The Service notes that there are some administrative errors in the bill text. Units P30 and P30P both appear on two map panels, and Unit FL-92 appears on a separate panel. However, the legislation refers to Units P30 and FL-92 as though they are on the same map. Additionally, Unit P30P is not identified in the legislation, though it is depicted on the same map panels as Unit P30. While the intent of H.R. 4222 is unclear, the Service is aware that Gulf County has long advocated for the removal of the application of the CBRA to these two units, so that Federal funding for beach renourishment, flood insurance, disaster assistance, and other Federal financial assistance would be available to the community. In the past, the Service has testified in opposition to legislation that would have done that.

H.R. 4222 was introduced on March 12, 2014. The Service has not yet conducted a comprehensive review or produced draft revised maps for Units P30 and FL-92. Our remapping priorities for FY 2014 have already been established and do not include a remapping of Units P30 and FL-92. However, we would be happy to work with the Subcommittee and the bill sponsor to determine the best way to move forward to conduct the necessary research and prepare comprehensively revised maps for these two units. Revised maps should address any legitimate mapping errors and propose the addition of undeveloped coastal barrier areas to the CBRS (in accordance with P.L. 109-226), while balancing the Service's many other CBRS mapping priorities. Because revised maps have not been prepared for Units P30 or FL-92, the Service does not have a position on H.R. 4222 at this time.

#### **Conclusion**

The CBRA is now more important than ever. Projected sea-level rise highlights the need for the CBRA as a common-sense policy that saves taxpayer dollars while also promoting smart coastal management practices. The Administration supports map modernization as an effort that will make administration of the CBRA more efficient, more transparent by making CBRS information more accessible to the public, and preserve the long-term integrity of the CBRS.

Thank you for the opportunity to testify today on the CBRA. I am happy to answer any questions and look forward to working with the Subcommittee as it considers these bills.